

Ari B. Teman

The Honorable Judge Paul Engelmayer
Southern District of New York
40 Foley Square
New York, NY 10007

April 26, 2022
Nisan 25, 5782

Re: Letter Motion to allow for travel to Israel to be with mother who is ill and requires surgery, and to perform comedy

Your Honor,

The Defendant writes seeking permission to travel to Israel to be with his mother who requires surgery and to perform comedy. As Your Honor knows, Defendant has performed for a sold-out Habima (Israeli's National Theater), the IDF, and many venues in Israel, and can earn a living doing comedy there for a period of time (<https://www.jpost.com/Arts-and-Culture/Entertainment/A-funny-thing-happened-on-the-way-to-the-shelter-369095> , <https://www.israel21c.org/rocket-shelter-comedy-blasts-into-israel/>). As well, Defendant can continue to support his clients from there.

Your Honor has graciously allowed me to travel to Australia and I have done so and returned, so I hope Your Honor will allow the same permission here.

I am concerned that should something happen to my mother I will not be able to see her before my appeal is decided, which would be another irreversible loss, and as Your Honor knows this case has been repeatedly delayed for quite some time and at great personal, mental, and financial expense. My mother's condition is such that she is unable to travel here and is homebound much of the time. My mother's younger brother recently passed at a young age so I am even more concerned about the possibility of not seeing her in person if I must wait for the end of the appeal.

Seeing my family and being around them would also be very helpful for my mental health, which has suffered tremendously from years of isolation. I went nearly two years without a hug from anyone. I would really appreciate it if I could hug my parents and be hugged by them.

There is no risk that the Defendant will not return to the United States long before he would be required to surrender to serve any sentence:

Israel (like Australia) has extradition to the United States, and does not grant citizenship to individuals with pending criminal matters as this case. Therefore there is no risk of the Defendant remaining in Israel beyond the time allowed by Your Honor. Israel is also heavily-policed during this time, as has been reported in the news.

The Government concedes that the Defendant is not a flight risk and not a threat to the community.

The Defendant has already paid restitution in full.

During this time the Defendant will remain in therapy via video chat and phone (as currently is the case), as per the court order and continue his pretrial supervision requirements.

Defendant will inform pretrial supervision of any location where he will stay, and be available via phone and video chat.

Israel is nearly 100% vaccinated, which makes it a relatively safe place for the Defendant to travel, and Defendant is also vaccinated and has recovered from COVID-19 which is also said to offer some protection.

Because Your Honor concedes there are issue(s) which warrant bond-pending Appeal, and because such a process may take much longer than my mother can delay surgery and recovery, and because I can earn a living in Tel Aviv, I respectfully ask the Court for this permission to visit my mother and perform in Israel for a period of 90 days starting in May.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ari Teman', with a stylized, wavy line above it.

Ari Teman,
Defendant, pro se